Regional Remediation Team

ciba

Ciba-Geigy Corporation
P.O. Box 71
Toms River, NJ 08754

Telephone 908 914 2500
Fax 908 914 2909

FAX (401)277-2017

November 10, 1995

STATE (RIDER) AGREED !

Mr. Joseph Unsworth, P.E.
Principal Engineer
Department of Environmental Management
Division of Site Remediation
291 Promenade Street
Providence, R.I. 02908-5767

RE: CIBA CRANSTON RCRA SITE
COFFERDAM SEDIMENT IRM

Dear Mr. Unsworth:

Ciba requests that the Department reconsider its requirement to cut off the sheetpiling at the river bottom after the Cofferdam Sediment excavation has been completed. Our reasons for this request are:

- The installation of the silt curtain has significantly lowered/eliminated the possibility of sediment resuspension outside the Cofferdam Area. Continuous turbidity monitoring up/downstream shows no effect when the sheetpiling is being driven.

- Driving of the sheeting piling itself is much easier than anticipated because the bottom is composed of fines which have not consolidated. The "H" supports used to install the sheet piling are being easily removed without resuspending the sediment.

- Cutting or driving the sheet piling below the river bottom may eventually represent a navigation hazard if erosion occurs or the piles work their way "out," exposing them a few feet from the bottom. We can not guarantee this would not happen, except by pulling the sheeting, as originally proposed.
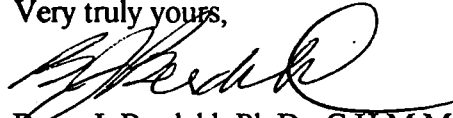
- Removal of the sheeting will allow the steel, after decontamination, to be re-used.

We understand that you will visit the Site on Tuesday, November 14, 1995. Michael Goodman and/or Matt Watson of my staff will be there at that time and will arrange a demonstration by Sevenson of removing the "H" supports, which is part of the routine installation. They will also show you the past and current turbidity data.

If there are any questions about this request, please call me at (908)914-2715.

Very truly yours,

Barry J. Berdahl, Ph.D., C.H.M.M.
Regional Compliance Manager

c: F. Battaglia, USEPA
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